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ENVIRONMENTAL COMPLIANCE SERVICES INC.

Consulting Specialists in  
Hazardous Waste  
Industrial Waste Water Treatment  
NPDES Compliance

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Mr. Thomas Mahin  
Massachusetts DEQE  
Northeast Region  
5 Commonwealth Avenue  
Woburn, MA 01801

RE: American Glue & Resin Co.  
Middleton, Massachusetts

Dear Mr. Mahin:

Environmental Compliance Services, Inc. (ECS) has conducted a preliminary investigation attempting to trace, locate and reference existing and historical on site subsurface disposal systems in place at American Glue & Resin Company located in Middleton, Massachusetts.

Presented within please find a schematic depicting existing drain lines and associated piping currently in place at American Glue. Please note that no data and records were uncovered during ECS's investigation revealing in house piping and existing septic system design.

An initial investigation has revealed that current site drainage partially flows to the on site septic system, via a grated manhole, thus potentially overloading and taxing the inplace system.

Additionally a historical subsurface disposal system has been unveiled (reference Attachment I). Preliminary findings indicate that spent wash waters resulting from the glue manufacturing process were discharged to a sand filtration system which eventually drains to the abutting wetlands. Specific engineering design plan for this system could not be found.

ECS emphasizes this system has not been used for sometime, this is evidenced as inflow and outflow sources associated with this system have been completely overgrown with primary vegetation.

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Based upon the information obtained and data gathered during ECS's initial investigation, ECS proposes the following:

1. To excavate in and around the vicinity of American Glue's existing septic system and historic sand filtration system (reference Attachment I). The purpose of the intended excavation is to evaluate the integrity of the existing septic system as well as confirm existing and historical discharge sources to both sand filtration and septic systems.
2. Revise existing on site storms water drainage system to eliminate flooding conditions and surface drainage impacts to the current septic system.
3. Replace existing grated manhole (current inlet to septic tank) with a sealed manhole cover, to eliminate additional flow.
4. Conduct a thorough Phase I investigation in the vicinity of the sand filtration system to define MGL c. 21-E applicability.

Please note that due to the proximity of abutting wetlands follow up investigations will be conducted in accordance with chapter 131 section 40 of Massachusetts Wetlands Protection Act.

If there are any questions please do not hesitate to contact our office.

Respectfully,

By

  
Mark C. Hellstein - Principal

MCH/smm